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May 16, 2024

VIA EMAIL AND ECF

The Honorable Eric N. Vitaliano **United States District Court** Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

> Re: United States v. Daniel Sargeant Criminal Docket No. 19-319 (ENV)

Dear Judge Vitaliano:

We represent the defendant Daniel Sargeant in the above-referenced case. We write to request a modification of the conditions of Mr. Sargeant's release on bond to permit him to travel to Nice, France and Monaco between May 21 and May 29, 2024 for family and business purposes, as described more fully below.

The Court may recall that the current conditions of Mr. Sargeant's bond permit him to reside in Florida, to travel to certain U.S. jurisdictions, and to travel to the United Kingdom for business purposes, with the permission of Pretrial Services. Mr. Sargeant has a business trip to the United Kingdom beginning May 16th, and Pretrial Services has approved the travel and provided Mr. Sargeant with his passport. The proposed additional trip to Nice, France and Monaco would be to permit Mr. Sargeant to watch his son compete in a Formula 1 race in Monaco between May 24-26, 2024. In addition to wanting to watch his son race, Mr. Sargeant also helps manage his son's business as a Formula 1 driver, and would be meeting with his son's racing team principals and sponsors during the trip. If approved, Mr. Sargeant would fly from London on May 21 to Nice, France, return to London on May 29, and then return from London to the United States on June 2, 2024. The travel details of the proposed trip have been provided to Mr. Sargeant's supervising probation officer in the Southern District of Florida, and Pretrial Services in the EDNY, and neither objects to the requested travel. In addition, we have conferred with the government's counsel, AUSA Jonathan Lax and DOJ Assistant Chief Derek Ettinger, and they likewise do not object to the proposed travel.

Respectfully submitted,

KELLY T. CURRIE THOMAS HANUSIK

cc: AUSA Jonathan Lax and DOJ Assistant Chief Derek Ettinger (by ECF)

> EDNY Pretrial Technician Peter Liegey (by email) SDFL Probation Officer Mackenzie Hilaire (by email)